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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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PATIENT CARE ASSOCIATES LLC a/s/o A.A.,	:	Civil Action No. 13-1819 (CCC)
N.B., P.D., C.E., K.N., and F.R.,	:	
	:	
Plaintiff,	:	
	:	NOTICE OF MOTION TO DISMISS
-against-	:	
	:	
JP MORGAN CHASE & Co.; ABC CORP. (1-10)	:	
(Said names being fictitious and unknown	:	<u>Document Electronically Filed</u>
entities),	:	
	:	
Defendants.	:	
-----	X	

To: Andrew R. Bronsnick, *Attorney for Plaintiff*
Massood & Bronsnick, LLC
50 Packanack Lake Road East
Wayne, New Jersey 07470

MR. BRONSNICK:

PLEASE TAKE NOTICE that on Monday, May 20, 2013, at 10:00 a.m. or as soon
thereafter as counsel may be heard, the undersigned attorney for Defendant JPMorgan Chase &

Co. shall move, pursuant to Fed. R. Civ. P. 12(b)(6), before the Honorable Claire C. Cecchi, United States District Court Judge for the District of New Jersey, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an Order dismissing Counts Two and Three of the Complaint, with prejudice, and striking Plaintiff's claim for compensatory damages under Count One and request for a jury trial.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant shall rely upon its accompanying Memorandum of Law.

PLEASE TAKE FURTHER NOTICE that Defendant does not request oral argument on this Motion.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is enclosed herewith.

Dated: Newark, New Jersey
April 26, 2013

PROSKAUER ROSE LLP

By: /s/ Lawrence R. Sandak
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